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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

**3:20-cr-00436-IM**

**v.**

**MOTION TO DISMISS WITH  
PREJUDICE**

**KRISTOPHER MICHAEL DONNELLY,**

**Defendant.**

The government moves the Court for an Order under Fed. R. Crim. P. Rule 48(a) to  
dismiss with prejudice the indictment against Defendant, in the best interests of justice.

Dated: October 10, 2021

Respectfully submitted,

SCOTT ERIK ASPHAUG  
Acting United States Attorney

/s/ Thomas S. Ratcliffe  
THOMAS S. RATCLIFFE, ILSB #6243708  
Assistant United States Attorney

**Motion to Dismiss With Prejudice**

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